

**STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION**

STAFF REPORT FOR REGULAR MEETING OF OCTOBER 26, 2001

Prepared on September 25, 2001

ITEM: 19

SUBJECT: Executive Officer's Report to the Board

Brief discussion of some items of interest to the Board follow. Upon request, staff can provide more detailed information about any particular item.

Watershed and Cleanup Branch Reports

**REGULATION SUMMARY OF
AUGUST 2001**

[Corinne Huckaby 805/549-3504]

Orders

Reports of Waste Discharge Received	3
Requirements Pending	48
Inspections Made	24
Self-Monitoring Reports Reviewed (WB)	105
Self-Monitoring Reports Reviewed (CB)	60
Stormwater Reports Reviewed	400

Enforcement

Non-Compliance Letters Sent:

NPDES Program	3
Non-Chapter 15 WDR Program	10
Chapter 15 Program	0
Unregulated	3
Stormwater	250
CAOs Issued	0
ACL Complaints	0

WATER QUALITY CERTIFICATIONS

[Corinne Huckaby 805/549-3504]

In general, staff recommends "Standard Certification" when the applicant proposes adequate mitigation. Measures included in the application must assure that beneficial uses will be protected, and water quality standards will be met.

Conditional Certification is appropriate when a project may adversely impact surface water quality. Conditions allow the project to proceed under an Army Corps permit, while upholding water quality standards.

Staff will recommend "No Action" when no discharge or adverse impacts are expected. Generally, a project must provide beneficial use and habitat enhancement for no action to be taken by the Regional Board. A chart on the following page lists applications received through September 21, 2001.

Item No. 19
Executive Officer's Report

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October 26, 2001

Date Received	Applicant	Project Description	Project Location	Receiving Water	Action Taken
August 6, 2001	Tosco Refining Co.	6 inch Unocap Line 353	Orcutt	Unnamed drainages	Incomplete Application
August 9, 2001	Ca Dept. Parks and Recreation	Gaviota Hot Springs Road Repair Project	Gaviota State Park	Hot Springs Creek, Gaviota Creek tributary	Incomplete Application
August 15, 2001	Creekside Parcel Assoc.	Creek bank stabilization Project	Atascadero	Atascadero Creek	Standard Certification
August 16, 2001	Creekbridge Homes, LP	Construct Stormdrain Outfall Structure (C28)	Salinas	Gabilan Creek, Carr Lake	Pending
August 16, 2001	Creekbridge Homes, LP	Construct Stormdrain Outfall Structure (GHK)	Salinas	Gabilan Creek, Carr Lake	Pending
August 17, 2001	Santa Clara Valley Water District	Bank stabilization project	Gilroy	Bodfish, Uvas Creek	Standard Certification
August 20, 2001	Richard Woodland	Woodland Plaza III, Parcels 1 and 3	Paso Robles	Unnamed creek, Salinas River tributary	Pending
August 20, 2001	Santa Barbara County PWD	Clearing Culverts along Refugio	Santa Barbara County	Canada del Refugio, Pacific Ocean	Standard Certification
August 21, 2001	Neda Demayo	Access road and bank stabilization project	Lompoc	Salsipuedes Creek	Incomplete Application
August 22, 2001	Monterey County	Arroyo Seco Road Bridge Replacement for Seismic Safety	Soledad	Arroyo Seco River	Pending
August 22, 2001	Monterey County	Lonoak Road Bridge Replacement	King City	Lewis Creek	Pending
August 27, 2001	U.S. Bureau Reclamation	Fish Passage Impediment Modification	Lompoc	Salsipuedes Creek	Standard Certification
August 27, 2001	San Luis Obispo County	Salinas Water Pipeline Bank Stabilization	Santa Margarita	Trout Creek	Pending
August 28, 2001	Coastal San Luis RCD	Restoration Permit Coordination Program	SLO County	Various waterbodies throughout SLO County	Pending
August 28, 2001	City of Santa Barbara Parks and Recreation	Streambank Hidden Valley	Santa Barbara	Arroyo Burro and Mission Creeks	Pending
August 31, 2001	Venoco, Inc.	Elmwood Marine Terminal Road Repair	Goleta	Deveraux Creek	Pending
August 31, 2001	City of Gonzales	Improvement of Slough Crossing Project	Gonzales	Salinas River	Pending
September 5, 2001	Madonna Construction	Los Osos Valley Road Improvement Project	San Luis Obispo	Wetlands	Pending
September 5, 2001	Provident Development	Uvas Estates Development Project	West of Morgan Hill	Uvas Reservoir, Eastman Ck, intermittent drainage, seep, wetlands	Pending
September 7, 2001	Jerry and Glenda Taft	Private Vehicle Bridge Taft Ranch	Atascadero	Salinas River	Standard Certification
September 7, 2001	Carole Keller Carlson	Subdivision Stormdrain System	Arroyo Grande	West Fork Islay Creek	Pending
September 10, 2001	Santa Barbara Environmental Health	Protection of river bank	Cuyama	Cuyama River	Pending
September 12, 2001	SLO County Planning/Bldg	Dover Canyon Road Bank Stabilization Project	Templeton	Summit Creek	Pending
September 12, 2001	Sardis Hickam	Installation Flatcar bridge across Creek	Cambria	Santa Rosa Creek	Pending
September 19, 2001	Santa Barbara County PWD	Ballard Canyon Road Repair	Santa Ynez Valley	Ballard Creek	Pending
September 20, 2001	ExxonMobil	Preinstallation Cable Conduit Inspection	Santa Barbara Channel, Pacific Ocean	Santa Barbara	Pending

WATERSHED BRANCH REPORTS

Status Reports

Morro Bay Shellfish Technical Advisory Committee [Shanta Duffield 805/549-3464]

Dr. Mansour Samadpour, who has been performing the DNA fingerprinting portion of the Morro Bay DNA study, will be coming to San Luis Obispo to present the *raw data* to the Shellfish Technical Advisory Committee on October 15, 2001. This will be a presentation of the raw data without interpretation. Cal Poly will be completing the data interpretation and draft report, inclusive of the entire study, by November 15, 2001. Staff will integrate this draft report into the Total Maximum Daily Load for Morro Bay pathogens, which will be completed in draft form by December 30, 2001. The May 18, 2001 Executive Officer's Report stated that *results* for the Morro Bay DNA study were expected October 15, 2001. This report should have stated that the *raw data* would be presented on this date and the data *analysis* would be completed by November 15, 2001. We will keep the Board informed on the progress of this cutting edge work. This project has terrific implications beyond Morro Bay, including potentially helping with the Beach Contamination issue.

Morro Bay Power Plant Modernization Project [Michael Thomas 805/542-4623]

This report is a brief update on Duke Energy's Morro Bay Power Plant modernization project.

Review of Cooling Water Alternatives

The U.S. Environmental Protection Agency (U.S. EPA) offered the services of its technical consultant, Tetra Tech, to help Regional Board staff review Duke Energy's cooling water system alternatives analysis. Staff arranged for Tetra Tech to review Duke Energy's cooling water alternatives analysis and provide a report to the Regional Board. Tetra Tech's draft report was submitted and Regional Board and Energy Commission staff are currently reviewing it.

At the July 12, 2001 workshop the Board directed staff to consider other cooling systems, such as "twice-through" cooling and hybrid systems. Twice-through or multiple-pass systems, where cooling water is recycled through the power plant more than once, could be designed in several ways. In fact, this is the concept behind the systems being considered. For example, all cooling towers are multiple-pass systems. In a cooling tower system, water is re-circulated through the power plant and the tower, and "make-up" water is added as needed to account for evaporation. The main issues with cooling towers are the amount of make-up water needed, visual impacts, and noise. The use of cooling towers appears infeasible at Morro Bay because of the limited fresh water supply. Dry cooling is also a re-circulating system. Dry cooling constantly recycles water through the power plant and a large air condenser, and the condenser dissipates heat to the atmosphere. As with cooling towers, the issues with dry cooling systems are cost, visual impacts, and noise.

The types of hybrid or specialized systems that could be considered are essentially limitless in number and variation. Therefore, for the purposes of the NPDES permit, staff needs to limit our review to those systems that are available, proven, and feasible for this particular site. The lack of fresh water essentially eliminates cooling towers and hybrid variations that would use cooling towers. One type of hybrid system that has been used at one power plant utilizes "helper" cooling towers. Helper cooling towers handle a portion of the cooling capacity and therefore reduce the amount of entrainment and impingement. The lack of fresh water in Morro Bay makes "helper" cooling towers infeasible. That leaves us with the three alternatives identified by Regional Board and Energy Commission staff: dry cooling, an aquatic filter, and habitat enhancement.

As directed by the Board, the various aspects of dry cooling, the aquatic filter, and habitat enhancement are being analyzed before an NPDES permit is considered for adoption. Accordingly, the Executive Officer sent a letter on August 13, 2001 to the Energy Commission (CEC) requesting a site-specific CEQA analysis of the three alternatives. Another letter was sent on September 17, 2001, (See Attachment No. 1) further defining

the site-specific CEQA analysis needed by Regional Board staff. The Energy Commission has agreed to conduct the site-specific analysis and will include it as part of its Final Staff Assessment.

NPDES Schedule

According to CEC staff, their Final Staff Assessment report may be distributed as early as November 2, 2001. If staff receives the Final Staff Assessment on November 2nd, staff will work toward distributing a draft NPDES permit by November 21, 2001 (in time for the Energy Commission's evidentiary hearings that may begin on November 26th). CEC staff also indicated that final Certification by the Energy Commission is now scheduled for April 2, 2002. Since the NPDES permit must include findings based on Energy Commission Certification, staff cannot bring a final draft permit to the Board before May 17, 2002 (May 2002 Board meeting), unless the CEC is able to accelerate the current schedule. Our staff continues to work with all parties as expeditiously as possible to facilitate a thorough and timely process.

Los Osos Wastewater Project [Sorrel Marks 805/549-3695]

Following is a brief summary of issues relating to the Los Osos wastewater project that have occurred since the status report was provided for the Board's July 13, 2001 meeting.

On June 27, 2001, the Los Osos Community Services District (CSD) received overwhelming support for the community wastewater project by formation of an assessment district (supported by 86% of the votes). Since that time two lawsuits (one challenging formation of the assessment district and the other seeking injunction through federal court) have been resolved in favor of the CSD.

The CSD is proceeding with the design phase and has contracted with the engineering firm of Montgomery Watson for project design. The CSD is on schedule with the compliance dates specified in Time Schedule Order No. 00-131.

Time Schedule Order No. 00-131 (adopted by the Board in November, 2000) includes the following compliance dates:

<u>Task</u>	<u>Completion Date</u>
Circulate draft EIR	12/15/00 (done)
Final CEQA document	04/01/01 (done)
Form assessment district or comparable financing for wastewater system	07/29/01 (done)
Complete approved design plans	07/15/02
Submit County Use and Coastal Development permits	07/15/02
Begin construction	09/06/02
Complete construction	08/30/04

Status Reports are due two weeks after each above date.

Further detail regarding the project status is summarized in the most recent quarterly status report from the CSD (See Attachment No. 2).

Basin Plan Exemption Request [Matt Fabry 805/549-3458]

Regional Board staff approved a request from Ms. Kim Hawk for an exemption to the Basin Plan prohibition regarding separation to groundwater for individual sewage disposal systems. Ms. Hawk proposed a mounded septic system for a single family dwelling at 6620 Lover's Lane in San Benito County, near the City of Hollister. The County of San Benito, Division of Environmental Health (County Health) approved the initial design and forwarded Ms. Hawk's application to the Regional Board for final review and approval.

The proposed system was designed to accommodate shallow groundwater conditions (three to four feet below the ground surface) at the subject property. The system was designed in accordance with the State Water Resources Control Board's 1980 *Guidelines for Mound Systems*. Regional Board staff commented on the initial design, and the applicant revised the design to incorporate staff's comments. The system is conservatively designed and will be monitored on a semi-annual basis by the design engineer or

registered professional. In addition, County Health staff will monitor the system after all rainfall events resulting in greater than one inch of precipitation.

Regional Board staff included standard approval conditions that prohibit deviating from design plans or exceeding flow limitations, and require notification of any changes in the volume, nature, or location of the discharge, or of any discharges threatening water quality or public health. Annual reports are required detailing the results of all monitoring activities. County Health staff will issue final permits for the proposed system.

Southern California Wetlands Recovery Project, Santa Barbara County [Julia Dyer – 805-594-6144]

In 1997, 17 State and Federal agencies signed a memorandum of understanding (MOU) to create the Southern California Wetlands Recovery Project (Project). The Project's goal is to develop and implement a plan of regional priorities to acquire, restore, and enhance southern California's coastal wetlands and watersheds. The Project area consists of the coastal watersheds of Orange, Los Angeles, San Diego, Ventura, and Santa Barbara counties. The Project agencies include:

- California Environmental Protection Agency
- State Water Resources Control Board
- Santa Ana, San Diego, Los Angeles, and Central Coast Regional Boards
- The Resources Agency
- Coastal Commission
- Coastal Conservancy
- Department of Fish and Game
- Department of Parks and Recreation
- State Lands Commission
- US Environmental Protection Agency
- US Army Corps of Engineers
- US Fish and Wildlife Service
- National Marine Fisheries Service
- Natural Resources Conservation Service

The Project organization is headed by a Board of Governors that is responsible for setting the policies that direct the activities of the Wetland Managers Group (WMG), the Public Advisory Committee, five County Task Forces, and the Science Advisory Panel. The Governing Board is

comprised of the top officials from the agencies, including Board Chairman Shallcross, although the Governing Board has an uncanny history of scheduling their meetings on the same day as our Board meetings. Coastal Conservancy staff manage the Project fiscal and programmatic responsibilities, and the Coastal Conservancy Board approves the Project grants and project expenditures.

The MOU establishes the steps the Project partner agencies take to achieve the overall goal. Those steps include: the establishment of a 20-year functional vision and a rolling five-year regional restoration program; securing funding from the public and private sectors to implement the program; identification of agency-nonprofit project partnerships; and monitoring and reporting on WRP progress to meet the goals.

At the May 18, 2001 Board of Governors meeting, the Board adopted the 2001-02 Work Plan, which lists 49 regional projects. Of these, the Project contributed funds for three current projects in Santa Barbara County: the Arroyo Hondo Watershed Acquisition, the Goleta Slough Tidal Restoration Study, and the Summerland/Greenwell Preserve Restoration. Additionally, the Project earmarked funds for the Carpinteria Salt Marsh Restoration and the Ellwood Beach Santa Barbara Shores Specific Plan.

Currently, the Project is developing the Regional Strategy, available in draft form through the their website: (www.coastalconservancy.ca.gov/scwrp). The Strategy will specify Project goals and priorities and incorporate the first 5-year Implementation Plan, the annual Work Plan, and a database of potential projects. The Strategy will be considered at the 2001 Southern California Wetlands Recovery Project Symposium/Board of Governors Meeting planned for November 29-30 in Orange County (location to be determined).

The Santa Barbara County Task Force met initially on July 20, 2001. The Task Force met on August 23rd in response to a Project request that the five counties discuss localized wetland issues and concerns. and again on September 14, 2001. Several key ecological, organizational and data/research priorities were outlined during these meetings, and the results will be distributed to the Task Force for finalization. The County priorities will be incorporated into the Regional Strategy.

Regional Board staff has participated in several of the above mentioned meetings of the Task Force, the Managers Group and the Governing Board.

Clean Beaches Initiative [Brad Hagemann 805/549-3697]

The State Water Resources Control Board staff provided the following description of Region 3 Clean Beaches Initiative projects in late August. The information includes schedules and additional information necessary for Proposition 13 funding. Regional Board contacts have been assigned, but all of the contracting work will be accomplished at State Board. The Santa Cruz projects are "Fast Track" projects and will be contracted first.

City of Santa Cruz – Main, Cowell and Seabright Beach – Dry Weather Storm Flow Diversion (\$1,475,000). Regional Board contact: Todd Stanley

The proposed project is to reduce bacteria levels at Main and Seabright Beach by installation of pumps and piping to divert dry weather flows to the sanitary sewer system. This project will also survey associated mainlines and laterals for leaks and repair them. The City plans to begin the inspections and sewer line repairs in September 2001. Construction of the diversion structures is anticipated to start in June 2002 and be completed in mid November 2002.

Additional information required:

- Confirm that project is exempt from CEQA and circulate decision for public review and comment.
- Identify how the project is consistent with existing water quality and resources protection plans.
- Submit a sample monitoring and reporting plan.
- Determine if the project is subject to Coho salmon, steelhead, or trout recovery plans.
- Identify the local cost share for the capital costs of the project.

City of Capitola and the County of Santa Cruz – Capitola Beach (\$100,000). Regional Board contact: Todd Stanley

The City of Capitola has not developed a project.

County of San Luis Obispo – Pismo State Beach (\$1,200,000). Regional Board contact: Scott Phillips

This project proposes to completely replace the Addie Street Lift station. The CEQA analysis and public review has been completed for this project. The design is scheduled to will be completed by September 2001. Construction will begin in October 2001 and is expected to be completed by the end of June 2002.

Additional information required:

- Identify how the project is consistent with existing water quality and resources protection plans.
- Submit a sample monitoring and reporting plan.
- Determine if the project is subject to Coho salmon, steelhead, or trout recovery plans.
- Identify the local cost share for the capital costs of the project.

County of Santa Barbara – Arroyo Burro Beach, Arroyo Quemado Beach, Jalama Beach, Gaviota Beach, Mission Creek (East Beach) and Refugio Beach – (\$2,000,000). Regional Board contact: Michael Higgins.

The proposed project descriptions are as follows:

Arroyo Burro Beach: This project includes the purchase of a Vactor Truck to remove wet and dry wastes from storm drains and catchment basins. At their October meeting the State Board will consider a resolution whether to approve \$278,000 (85% of total cost) for purchase of the Vactor truck. Design and construction of the storm water filter/separator system, are expected to be completed by August 2002.

Arroyo Quemado Beach: This project includes a feasibility study regarding construction of an enhanced treatment process for sixteen private residences. The project will likely include a septic system upgrade/ replacement. The feasibility study, permitting and design is expected to be completed by April 2002. Construction is expected to be completed by August 2002.

Jalama Beach: This project includes: (1) upgrade/improvements to the park's septic system

leachfield and (2) construction of a bioswale or artificial wetlands to treat parking lot runoff and other part "nuisance flows". Both of these projects are expected to be completed by July 2002.

Gaviota Beach: No proposal yet. Waiting on County Health Department for a watershed assessment.

Mission Creek (East Beach): This project includes the installation of a storm drain treatment facility to remove sediment, debris and petroleum pollutants entering Mission Creek from the Chapala storm drain system. The project is expected to be completed by November 2001.

Refugio Creek: This project includes: (1) the design and construction of the park's wastewater disposal system and (2) revise, finalize, permit and construct an existing 0.67 acre wetlands restoration plan and incorporate a bioswale for treatment of parking lot runoff and other incidental runoff from Park facilities. Both of these projects are expected to be completed by July 2002.

Additional information required:

- Identify how the project is consistent with existing water quality and resources protection plans.
- Determine if the project is subject to Coho salmon, steelhead, or trout recovery plans.
- Submit a sample monitoring and reporting plan.
- Identify the local cost share for the capital costs of the project.
- Determine if the projects have been noticed and subject to public review.
- Demonstrate ability to produce sustained benefits for 20 years.

County of Santa Barbara – Rincon Beach – Septic to Sewer (\$500,000). Regional Board contact: Michael Higgins.

The purpose of this project is to improve disposal of human waste at two heavily used coastal access points and thus reduce bacterial loading at Rincon Beach. This project would connect the existing County facility to the sanitary sewer and construct a permanent sanitary facility at the State Park. The project will take approximately 12 months to complete. Construction at the County facility will begin in October 2001 and be completed in July

2002. Construction at the State facility will also be within the same timeframe stated above.

Additional information required:

- Identify how the project is consistent with existing water quality and resources protection plans.
- Determine if the project is subject to the recovery plans for coho salmon, steelhead, or trout.
- Inform the Board of the permits necessary to complete the project.
- Submit a sample monitoring and reporting plan.
- Identify the local cost share for the capital costs of the project.
- Has been the subject of public review.
- Submit project timeline

County of Monterey (City of Pacific Grove) – Lover's Point (\$500,000). Regional Board contact: Lida Tan.

This project proposes to install in-line diversion structures on the storm drain outfalls and reroute dry weather flows to the sanitary sewer system. Design is anticipated to be completed and permits secured by February 2002, with construction anticipated to be completed by September 2002.

Additional information required:

- Complete CEQA requirements and describe how the public review will be conducted at the local level.
- Identify how the project is consistent with existing water quality and resources protection plans.
- Submit a sample monitoring and reporting plan.
- Determine if the project is subject to the recovery plans for coho salmon, steelhead, or trout.
- Identify the local cost share for the capital costs of the project.

CLEANUP BRANCH REPORTS

Corrective Action Plan Approvals

Staff regularly provides the Board with brief overviews of corrective action plans for underground tank cleanup cases. These reports are intended to keep the Board apprised of proposed cleanup activities as well as to comply with public notification requirements of the California Code of Regulations, Title 23, Chapter 16, Section 2728.

Under the public notification requirements, anyone may request review of information and decisions concerning the corrective action plan and the Board may hold a public meeting when requested, if there is sufficient public interest in the plan.

Underground Tank Program

Beacon Station No. 400, 1597 Freedom Blvd., Watsonville, Santa Cruz County [Matthew Keeling 805/549-3685]

Beacon (Ultramar, Inc.) Station No. 400 is an operating gasoline service station located on the southwest corner of Sydney Avenue and Freedom Blvd in northern Watsonville. The City of Watsonville Water Works Facility is directly adjacent to and south of the subject site at 1509/1521 Freedom Blvd. Two municipal wells, Well No. 1 and Well No. 5, located on the Water Works property, are approximately 350 feet and 130 feet from the Beacon Station, respectively. Two covered and lined earthen berm surface reservoirs with storage capacities of 500 thousand gallons and 5 ½ million gallons are also present on the Water Works property. Ongoing groundwater investigation activities indicate petroleum hydrocarbons, including MTBE have migrated in shallow groundwater onto the Water Works Facility property.

Ultramar submitted a corrective action plan (CAP) on August 21, 2001 proposing the combined implementation of groundwater extraction and soil vapor extraction around the underground storage tank system source area perimeter. Two proposed 4-inch diameter extraction wells and three existing 4-inch diameter monitoring wells will be utilized for groundwater extraction. Soil vapor extraction will also be implemented within the groundwater cone of depression from four of the groundwater extraction wells. Groundwater will be treated via a low-profile air-stripper followed by three 200-pound activated carbon vessels prior to discharge.

Extracted soil vapors will be treated via a catalytic oxidizer under the purview of the Monterey Bay Unified Air Pollution Control District.

Ultramar's consultant is currently working with the City of Watsonville for the location and permitting of an appropriate groundwater treatment system discharge. Staff understands the City of Watsonville is no longer approving wastewater discharge permits for groundwater treatment system discharges to the sanitary sewer. However, treated groundwater may also be discharged to the storm sewer, which will require an encroachment permit from the City Utilities Department, as well as enrollment under this Board's General NPDES Permit for Low Threat Discharges of highly treated groundwater.

Ultramar has been conducting interim monthly dual-phase extraction (extraction) since March 2001, from various monitoring wells adjacent to and on the City of Watsonville Water Works Facility property to remove impacted groundwater and hydrocarbon vapors from the subsurface. Approximately 308 pounds (49 gallons) of total petroleum hydrocarbons (TPH) have been removed in the vapor phase and approximately 8,750 gallons of shallow groundwater have been extracted for offsite disposal as of the July extraction event. Monthly extraction events are to continue until full-scale CAP implementation and treatment system startup. Additional events may be conducted in conjunction with the full-scale CAP for offsite monitoring wells located on the Water Works property adjacent the City wells.

Douglas Michie, Former Hampton Hotel/76 Service Station, 2601 Main Street, Cambria, San Luis Obispo County [Sheila Soderberg 805/549-3592]

In May 2001, Mr. Douglas Michie's consultant, GeoSolutions, Inc. submitted an Interim Corrective Action Plan (Plan) for a former service station property located at 2601 Main Street, Cambria. Mr. Michie co-owns the property with Ms. Valerie Hampton, although Mr. Michie has accepted responsibility to manage the investigation and cleanup of the property. The former service station is located approximately 600 feet from two Junge Family drinking water and irrigation wells and approximately 1,500 feet from Cambria Community Service District (CCSD) Well No. 3.

Petroleum hydrocarbon constituents, including the fuel additive methyl tertiary-butyl ether (MTBE), have been detected in ground water at concentrations exceeding this Regional Board's water quality objectives.

The Plan details the use of a mobile high-vacuum-dual-phase extraction (high vac) system for eight 15-day events with four additional 7-day events. The Plan proposes utilizing one well, MW-1R, located in the vicinity of the two former 3,000-gallon underground storage tanks, fuel dispensers, and associated piping as shown on Attachment 1. The high vac system thermally destroys extracted hydrocarbon vapors and extracted groundwater is used to lubricate the liquid ring pumps. Extracted water that cannot be utilized is stored in an onsite aboveground storage tank, sampled, then transported off-site to a recycling facility in northern California. In the Regional Board's May 11, 2001 letter to Mr. Michie, Regional Board staff concurred with implementation of the Plan, requested additional delineation of the petroleum hydrocarbons in soil and groundwater, and requested a report summarizing the first high vac event by July 30, 2001.

On June 5 and 6, 2001, respectively, Mr. Michie's new consultant, Frey Environmental, Inc. (Frey) submitted a work plan to delineate the MTBE plume and a report documenting the results of the initial high vac event. As reported by Frey, approximately 224 gallons of gasoline were removed from soil and groundwater when the system operated from May 14 to May 30, 2001. In addition, Frey recommended that the use of the mobile high vac system continue concurrent with their additional investigation efforts. In the Regional Board's June 25, 2001 letter to Mr. Michie, Regional Board staff concurred with the proposed investigation work and continued use of the high vac system as an interim corrective action, on the condition that the use of a permanent high vac system and other remedial technologies were evaluated as part of the corrective action plan process.

Since July 2001, Regional Board staff receives weekly updates from Mr. Michie's consultant as the investigation and interim cleanup continues and groundwater monitoring is performed as part of Monitoring and Reporting Program No. 97-45 (MRP). The final investigation report is due September 28, 2001, however new soil and

groundwater sampling data submitted in a work plan addendum on September 19, 2001, indicate that additional investigation to the south and southeast is needed to fully delineate the offsite MTBE plume in groundwater. During the September 5, 2001 groundwater sampling event, MTBE was detected in MW-1R, MW-2, MW-7, and MW-11 at 880 ppb, 180 ppb, 4,700 ppb, and 470 ppb, respectively. The private wells, sampled as part of the monitoring program, did not contain MTBE during this and other historical groundwater sampling events. At this time, depth-discrete groundwater samples are proposed in two cone penetrometer test borings (CPT-3 and CPT-4), however additional sample locations may be needed to complete the investigation.

(See Attachment No. 3).

Status Reports

Former Casmalia Hazardous Waste Landfill [Dan Niles 805/549-3355]

This status report provides the Regional Board a general overview of the Casmalia Site. The historic summary describes some of the more important regulatory aspects of the site and also provides a description of the site layout.

The **Status Update** portion of this report provides an overview of staff's current regulatory involvement with aspects of work being performed pursuant to the United States Environmental Protection Agency's (U. S. EPA) and Casmalia Resources Site Steering Committee's (CSC) Consent Decree.

Historic Summary

The Casmalia Site was an active hazardous waste disposal facility from 1973 to 1989. It is located in northern Santa Barbara County immediately north and east of Vandenberg Air Force Base, and approximately eight miles southwest of Santa Maria (See Attachment No. 4). The site is 252 acres, all of which are part of current remedial efforts.

The Regional Board and California Department of Toxic Substances Control regulated the facility

until U. S. EPA assumed lead authority on-site in 1992. Pre-existing Regional Board closure Orders remain in place, but have not been implemented or enforced since U. S. EPA became the lead agency.

During active facility operations, approximately 5.5 billion pounds of liquid and solid wastes were disposed at the site. Wastes included heavy metals, organic solvents, pesticides, polychlorinated biphenyls, petroleum hydrocarbons, oil field wastes, caustics/cyanides, and acids. Historically, the site contained numerous surface impoundments that were subsequently excavated under Regional Board orders and placed into four of six on-site landfills based on waste category (See Attachment No. 5). Five of the six landfills exist today (the sixth was excavated and placed into one of the remaining landfills) and are the primary focus of recent remedial efforts including plans for installing cover systems over the landfills (See Attachment No. 6).

Groundwater contamination containment, identification of waste sources, and landfill leachate collection and control are also key long-term remedial action measures for the Casmalia Site. These on-going efforts are occurring under a U. S. EPA lead multi-agency coordination effort involving the United States Fish and Wildlife Service; California Regional Water Quality Control Board, California Department of Toxic Substances Control, California Department of Fish and Game (collectively, "the State"); and County of Santa Barbara.

Waste is no longer accepted at the Casmalia Site. The site currently consists of the following features: (See Attachment No. 6)

- a) Five hazardous waste landfills;
- b) Seven burial cells;
- c) Eleven injection wells;
- d) A groundwater treatment plant;
- e) A series of ponds to collect storm water runoff and groundwater treatment plant discharges;
- f) Various groundwater collection trenches;
- g) A leachate collection system known as the Gallery Well and Sump 9B;
- h) Monitoring wells; and
- i) Water level piezometers.

In 1992, the U. S. EPA conducted an emergency response to stabilize the site. One problem was high water levels in the RCF Pond and A-Series Pond (the two largest storm water ponds) (See Attachment No. 6). These ponds are remnants from excavation of former waste impoundments and are now used as default storm water runoff collection ponds. Prior to the winter of 1995/1996, the two ponds filled to near capacity and overflow was imminent. To mitigate the situation, the U. S. EPA began discharging storm water runoff to Casmalia Creek under the State Water Resources Control Board's General Permit for Industrial Storm Water Discharges. The discharge was not treated and monitoring indicated trace levels of chlorinated organic constituents and the presence of elevated minerals and salts. The discharge was a one-time event to manage an emergency situation resulting from high water levels in the storm water ponds.

Short-term and long-term water management continues to be critical for ensuring structural integrity of the ponds and preventing overflow. Towards this effort, the Regional Board adopted a National Pollutant Discharge Elimination System (NPDES) permit (Order No. 99-034) in November 1999, which allows for a controlled discharge that is treated to meet water quality standards protective of the beneficial uses for Casmalia Creek. The NPDES permit has not been used; however, it remains an integral part of effective water management.

The discharge location to Casmalia Creek is depicted on Attachments No. 4 and 7. Any discharge would be intermittent and Order No. 99-034 restricts the discharge to the minimum amount necessary to maintain pond capacity and stability. A discharge would most likely occur during successive wet winter years with higher than average rainfall. Other discharges may be required to stabilize pond berms or empty the ponds for cleanup and closure.

Status Update

Key status update items include the following:

- Listing on the Federal "Superfund" National Priorities List

- Landfill Construction
- Remedial Investigation/Feasibility Study
- Gallery Well Spill and Sump 9B Spill
- Groundwater Extraction
- Pond Capacities
- National Pollutant Discharge Elimination System Permit Revision

Listing on the Federal "Superfund" National Priorities List

U. S. EPA listed the Casmalia Site on the Federal "Superfund" National Priorities List on September 13, 2001. Prior to the listing, U. S. EPA held a public meeting on July 11, 2001 to receive formal comments. The listing may allow U. S. EPA to use the Federal Superfund account to ensure investigation and cleanup work is completed. The Superfund allows U. S. EPA the option of taking over site operations if cleanup work is not properly completed and/or if adequate funding is not secured from parties who disposed waste at the Casmalia Site. The Superfund process may provide U. S. EPA increased regulatory leverage to require previous waste disposers to perform investigation and cleanup activities.

The State's regulatory role would remain essentially the same for the various phases of work if U. S. EPA accessed the Federal Superfund. The site would continue as a Responsible Party lead unless U. S. EPA decides to use the Federal Superfund for investigation, removal, and/or remedial actions.

Landfill Construction

In 1999, contractors for the CSC constructed a cap on the Pesticides/Solvents Landfill, which contains the highest volume of waste. Presently, four other landfills at the site have interim soil cover over wastes. The interim cover does not effectively prevent rainfall infiltration into wastes so the U. S. EPA proposed capping three of the four remaining landfills. The proposed remedy included a comment period where U. S. EPA received input from the public and other regulatory agencies including the State.

In July 2001, construction activities began for placing caps on the Caustic/Cyanide Landfill and Metals Landfill. During earth grading on the Caustic/Cyanide Landfill, waste drums were

discovered more near surface than expected. U. S. EPA ceased construction so the CSC's contractors could determine the extent of these shallow drums. Further investigation revealed approximately 200 drums located near the surface of the Caustic/Cyanide Landfill. As a result, U. S. EPA postponed work efforts for the Caustic/Cyanide Landfill and the CSC's contractor is in the process of re-designing the cap.

Construction efforts resumed on the Metals Landfill. Prior to commencing earthwork the contractor performed a drum investigation. Despite this effort, there were a few areas where earthwork uncovered drums and waste. The wastes were removed and either disposed off site or relocated and stabilized in an area that will be under the Landfill cap.

Construction of the Metals Landfill Cap should be completed late Fall 2001. Construction of caps over the Caustic/Cyanide and Acids Landfills is scheduled to begin Summer 2002 with completion by late Fall the same year.

The waste exposure events heightened media attention and community concerns. U. S. EPA responded to media inquiries and continues to update the community of work progress in public meetings and by direct contact with community representatives.

Remedial Investigation/Feasibility Study

The Remedial Investigation/Feasibility Study (RI/FS) involves a comprehensive study of soil, sediment, groundwater, and surface water to assess the nature and extent of contamination. Information gathered from this study will be used to evaluate remedial alternatives designed to contain and isolate wastes.

The agencies and CSC have completed a series of scoping sessions to help guide the RI/FS work plan development process. Investigation data gathered during the RI/FS process will be used to develop a Record of Decision to subsequently implement selected remedies.

The State's contribution during the RI/FS and Record of Decision process is to ensure that all "applicable or relevant and appropriate requirements" (known as "ARARs") of State regulations are met. The State also contributes

technical support regarding historic waste source locations and groundwater contaminant fate and transport considerations. U. S. EPA then decides whether to incorporate ARARs into investigation work and remedy implementation for the Casmalia Site.

Gallery Well Spill and Sump 9B Spill

On the evening of April 22, 2001, approximately 1,000 gallons of hazardous waste spilled from the Gallery Well as result of a pipeline break in the collection system. Leachate and other contaminated liquids from the Pesticides/Solvents Landfill collect in the Gallery Well by gravity flow. The CSC normally ships collected liquids from the Gallery Well off-site for disposal.

During a power outage, the CSC's on-site operator switched the Gallery Well pump to "manual" mode as opposed to its normal automated mode. Bypassing the "auto" mode deactivated a low-pressure switch designed to shut off the pump in the event of a pipeline failure. This allowed continuous pumping of contaminated liquids when the pipeline broke. According to the CSC, the PVC pipeline broke at a threaded connection. The break most likely resulted from degradation of pipe fittings from long term exposure to highly concentrated wastes pumped from the Gallery Well.

The CSC's contractor initiated spill response efforts including excavation and disposal of contaminated soil. The spill may have reached the RCF Pond. However, the pond was not sampled until 10 days after the spill making it difficult to determine potential water quality impacts. We are working with U. S. EPA to improve future spill response and sampling efforts.

On June 18 or 19, 2001, another hazardous waste spill occurred from conveyance piping from the Sump 9B as a result of aged piping dislodging at a joint. The Sump 9B groundwater extraction feature is located approximately 200 feet south of the Gallery Well and Pesticides/Solvents Landfill. While contaminated soils were excavated from the area, U. S. EPA postponed requiring the CSC to conduct post excavation soil sampling until upcoming phases of work performed under the RI/FS.

The two spills highlight the need to replace aged piping that conveys collected liquid hazardous waste at the Casmalia Site. U. S. EPA is working with the CSC on a schedule for replacing portions of the piping network. We are supporting U. S. EPA's efforts, and further recommending complete replacement of the entire piping network by October 15, 2001. The purpose of this recommendation is to have new piping in place prior to the 2001/2002 winter season. Spills during rain events can lead to quicker spread of contamination in storm water runoff and can create difficulties with cleanup operations during wet weather conditions.

Groundwater Extraction

In July 2001, extraction rates for highly contaminated liquids and groundwater were increased in key extraction features at the Casmalia Site. These features include the Gallery Well, Sump 9B, and the Perimeter Source Control Trench (PSCT) at sumps 1 through 4. The increased extraction was accomplished through negotiations between the U. S. EPA, CSC, and the State. A phased approach to increasing extraction rates (i.e., lowering the action levels) over time was eventually agreed upon by U. S. EPA and the CSC as part of the Interim Liquids Component of Work required in Statement of Work portion of the Consent Decree.

Highly contaminated liquids from the Gallery Well and Sump 9B are shipped off-site for disposal and contaminated groundwater is treated on-site with activated carbon to reduce organic contaminants. Inorganic contaminants such as metals are not currently treated with the on-site treatment system. The current treatment system is considered an interim measure until a final treatment system can be developed through U. S. EPA's RI/FS process. The selected system will be constructed as part of the Record of Decision phases of work.

Regional Board staff is working with U. S. EPA regarding implementation of treatment standards and requirements.

Pond Capacities

The five on-site ponds have adequate storm water storage capacities for this winter season; thus, a

discharge via the NPDES permit is not likely. The State has encouraged U. S. EPA to direct the CSC to implement an on-site water management plan that would reduce the likelihood of an NPDES discharge. Recently, the CSC proposed a series of measures to draw down accumulated pond water volumes primarily through enhanced evaporation using misters and sprinklers. Other incidental water uses include dust control on roads and use for soil conditioning during landfill construction activities.

As portions of the site are deemed "remediated" (such as capped landfill areas), a State Water Resources Control Board General Permit for Industrial Storm Water Discharges (General Permit) is envisioned for allowing off-site storm water discharges. Staff would issue the General Permit after verifying that storm water runoff meets standards protective of the beneficial uses of Casmalia Creek.

Allowing clean storm water discharges from the site reduces unnecessary accumulation of water in the on-site ponds. Another advantage is a reduction in the commingling of clean storm water with contaminated on-site pond water.

National Pollutant Discharge Elimination System Permit Revision

In November 1999, the Regional Board adopted an NPDES permit for the Casmalia Site. The permit was designed to allow for an off-site discharge to Casmalia Creek during higher than normal rainfall years. The NPDES permit allows for a controlled and regulated means of reducing high pond water levels to prevent the ponds from overflowing.

Staff are preparing a revised permit to reflect new U. S. EPA water quality standards for NPDES discharges. Our goal is to have a revised order for the Regional Board's consideration at the February 2002 Board Meeting.

Underground Tanks Summary Report dated Friday, September 24, 2001 [Jay Cano 805/549-3699]

(See Attachment No. 8).

Regionwide Reports

Regional Monitoring [Karen Worcester 805/549-3333]

Monitoring

Karen Worcester requested a meeting of representatives of the two Sanctuaries and the California Department of Fish and Game to discuss several elements of proposed CCAMP (our Central Coast Ambient Monitoring Program) marine monitoring activities. We are interested particularly in linking river and urban inputs to ocean impacts and are exploring capability of satellite imagery to support this effort. Several researchers in the area have shown these applications to be feasible, but we are interested in making this data available in a consistent and ongoing way for use by the broader research and monitoring community. We are interested in long term tracking of phytoplankton blooms and water column sediment plumes. New imagery can even be used to detect alluvial sediment plumes offshore river mouths and the "calming" effects of oil sheens on the ocean surface. We would seek to tie satellite information to existing real time monitoring activities by the Sanctuaries, the Central Coast Long-term Environmental Assessment Network (CCLEAN), Cal Poly, Partnership for Interdisciplinary Studies of Coastal Oceans (PISCO), and others to better understand land-based impacts to nearshore areas. The program would by necessity include water column monitoring to groundtruth and "calibrate" imagery. The group agreed these would be useful tools in broad application and will be working through the statewide Marine Mapping Users Group (MMUG) to develop agency support and to seek funding. CCAMP may be in a position to provide matching funds for other grant sources through proposed settlement funds.

Karen Worcester and Dave Paradies are providing analytical support for CDFG sea otter researchers in completion of a paper for publication on incidence of Sarcocystis and Toxoplasma infections in sea otters from 1997 to the present. These protozoal organisms are transmitted primarily by cats and opossums. There is a high incidence of infection in beach-recovered bodies in our region. The researchers are interested in geographic distribution of mortalities, particularly

regarding proximity to waste water discharges, river mouths and urban areas. Confounding factors include probability of finding dead animals (human access to shoreline) and ocean current movement of bodies after death.

Karen spent three days at Rancho Cordova attending a statewide ambient monitoring program (SWAMP) Technical Workshop. This workshop addressed standardization of analytical methodologies being used by the State Master Contractor and Regional Board private laboratories.

Toxic Substances Monitoring Program sampling for fish tissue chemistry was conducted at several sites in the Central Coastal rotation area (Carmel River to Oso Flaco Lake). Pre-dawn dissolved oxygen sampling has been completed for the summer in the Santa Barbara area. We are revising our SWAMP task order in the Santa Barbara area to include sediment chemistry and toxicity, water toxicity for two species, and follow-up Toxicity Identification Evaluations. This work will be done in early winter and spring, coincident with sampling of benthic invertebrate assemblages.

Data Management

The Department of Health Services (DHS) database on drinking water has been reformatted by staff to make it more accessible and useable in GIS format. It will now be used to support Basin Planning and assessment activities, with initial focus in the Pajaro watershed.

We have developed administrative tools over the last month which provide for electronic checking of Chain-of-Custody forms against final database content, to automatically enter new line items into the database, and to identify data which has been omitted or erroneously duplicated. We also completed tools which allow staff to electronically merge datasets from contract laboratories and from datasonde files (they are the data files our multiparameter probes store).

Karen has been supporting the Monterey Bay National Marine Sanctuary Citizens Monitoring Program efforts to adapt the CCAMP data management system and link data to their newly developed web site. This has primarily consisted

of GIS support in developing maps which can interface with our software.

Basin Planning

Basin Planning staff have been working on development of a Pajaro watershed assessment report. They are beginning by thoroughly reviewing the CCAMP watershed Monitoring report, and are using other literature and data as necessary to develop watershed assessment information for incorporation into the Basin Plan and EPA's Water Body Assessment. They will be developing recommendations for action related to findings; for example, whether adjustments are recommended to site-specific objectives, or whether the monitoring program should be adjusted to address newly emerging issues. The newly reformatted DHS database will provide an important data framework for the groundwater component of this work..

The proposed Triennial Review List will be brought before the Board in December and is currently out for public review and comment. The Triennial Review List sets Basin Planning priorities for the upcoming three years. The new list has been considerably restructured from the prior one, in part because TMDLs have been removed from this list, since they are being addressed through the 303(d) List (being brought before the Board this month). Many small items have been consolidated into larger ones. For example, the old list included a number of nitrate management plans for specific groundwater basins; the new list will consolidate these into one plan.

Total Minimum Daily Loads [Lisa McCann 805/549-3132]

Attached is a table of Total Maximum Daily Load components to be completed during the current Fiscal Year (See Attachment No. 9).

Update of State Board Enforcement Policy [Brad Hagemann 805/549-3697]

The State Board's current Water Quality Enforcement Policy was adopted in 1996. The current Policy describes general principles the

Regional Boards should follow in their enforcement work. While it endorses statewide consistency, its general nature does little to achieve that end. The one specific requirement of the existing Policy is that Regional Board staff must track and report certain types of violations to the Regional Board. We accomplish this via our Enforcement Report that we include in every Board meeting agenda package.

State Board staff has been working to develop a new Enforcement Policy for the last year or so. A draft of the new policy was distributed for public review late last year. In response to significant comments, State Board staff re-worked the Policy and a revised draft was released in July for internal review. Staff provided comments on the draft in late August (See Attachment No. 10). The revised draft policy will be released for public comment within the next several weeks.

The new draft policy is much more detailed than the existing policy and contains requirements that would promote statewide consistency among the Regional Boards. The draft policy includes provisions that would:

- .. Identify a list of "priority" violations that must be evaluated for possible enforcement action.

- .. Identify types of enforcement actions that may be used and discusses procedural issues associated with them.

- .. Describe specific recommended enforcement responses to certain more serious types of violations (e.g., falsification of reports, nonpayment of fees, and preventable spills that result in toxicity to wildlife or public health threats).

- .. Describe in some detail a process for developing recommended administrative civil liability (ACL) assessments. This process is based on the factors defined in the Water Code that the Board is required to consider in setting these amounts. The policy states that the process is to be used by staff in developing a recommended assessment, but that the Board has discretion when considering the factors. The policy would require that ACL orders adopted by the Board specifically address these factors. The policy would also require that economic benefit be recovered in all ACL actions (which is currently required for most, but not all, ACLs).

- .. Identify criteria for appropriate supplemental environmental projects (SEPs). The policy supports SEPs, but would impose limits on how they are selected and managed. (The SEP procedures in the policy, however, are generally consistent with procedures we already use.)

- .. Limit the use of compliance projects to situations where the avoided cost associated with the compliance project was specifically included as part of the ACL assessment.

- .. Require statewide standardization of periodic reporting of violations to the Regional Boards.

We believe that the fundamental issues that should be considered in reviewing this draft policy are its effect on our ability to manage our resources and its effect on our enforcement discretion. Much of the draft policy is consistent with enforcement procedures that we already use. The Policy's requirement to identify and evaluate "priority" violations would likely result in an increased emphasis on enforcement work with some associated reductions in other areas. The Policy may also result in some loss of enforcement discretion (for example, in its limitations on the use of CPs). Staff will notify the Board when the Policy is available for public comment and would welcome any Board input or formal comments.

Administrative Reports

Water Quality Coordinating Committee Meeting [Roger Briggs 805/549-3140]

The next Water Quality Coordinating Committee (WQCC) meeting will be held on November 1-2, 2001, at the Doral Palm Springs Resort. The WQCC meeting will be hosted by the Colorado River Basin Regional Board (Region 7). The meeting will begin at 1:00 p.m. on Thursday, November 1 and close at noon on Friday, November 2. Reservations and the meal fee are due by October 9th.

Presentations and Training [Roger Briggs 805/549-3140]

Matthew Keeling gave an Above-Ground Storage Tank Program presentation and fielded questions at an Environmental Compliance Agricultural Workshop sponsored by the Monterey County Health Department, Division of Environmental Health, at the Agricultural Conference Center in Salinas on August 22, 2001. Additional presentations were given by Health Department staff regarding the County's Environmental Health program in relation to the agricultural community. Members of the local agricultural community and various environmental contractors were in attendance. Jay Cano gave a presentation to the San Luis Obispo County Health Commission regarding the state of MTBE sites in San Luis Obispo County.

Carol Hewitt attended Telephone Communication training at the State Training Center on September 18, 2001.

On September 27-28, 2001, Region 3 hosted the Department of Defense Program roundtable meeting. Program Managers from the nine Regions and State Board attended the meeting. On September 27th the managers toured various clean-up sites on Vandenberg Air Force base with an escort by base Environmental Program Director, Lieutenant Colonel Scott Westfall and his staff. On Friday the 28th, the administrative roundtable meeting was held in the Region's office.

Matt Fabry, Jennifer Bitting and Mark Angelo (watershed branch) are attending a Fluvial Geomorphology workshop conducted by Dr. Matt Kondolf in Bishop on October 1-5, 2001.

On September 20th, approximately twenty staff attended a local defensive driver training class. Regional Board staff is required to take the class at least every four years.

ATTACHMENTS

1. RWQCB Letter dtd 9-17-01 to CEC re Morro Bay Power Plant Modernization
2. Montgomery Watson Letter dtd 7-3-01 re Los Osos CSD Quarterly Status Report
3. Cambria Site Sketch
4. Casmalia Site Location Map
5. Casmalia Historic Waste Disposal Operations Map
6. Casmalia Current Site Configuration Map
7. Casmalia Current Site Features Map
8. Underground Tanks Summary Report dtd 9-24-01
9. TMDL Components to be Completed during Fiscal Year 2001-2002
10. Memo dated 8-30-01 re Comments on Draft Enforcement Policy